

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

TAYLOR BUTLER,)	CAUSE NO. 1:22-cv-01232
)	
Plaintiff,)	
)	
v.)	
)	
SPEEDWAY LLC,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Thomas L. Davis, counsel for defendant Speedway LLC, states:

1. On March 21, 2022, plaintiff Taylor Butler, filed her Complaint for Damages against defendant Speedway, LLC in the Marion County Superior Court of Indiana, under Cause No. 49D12-2203-CT-009127.

2. Speedway LLC, a Delaware LLC, with its principal place of business in Ohio, is wholly owned by SEI Speedway Holdings, LLC, a Delaware LLC, with its principal place of business in Texas.

SEI Speedway Holdings LLC is wholly owned by 7-Eleven, Inc., a Texas corporation with its principal place of business in Texas. 7-Eleven, Inc. is wholly-owned by SEJ Asset Management & Investment Company, Inc. ("SAM"), a Delaware corporation, with its principal place of business in Texas. SAM is owned, in part, by Seven & i Holdings, Co., Ltd and Seven-Eleven Japan Co., Ltd. ("SEJ"), Japanese corporations. SEJ is wholly owned by Seven & i Holdings Co., Ltd., whose stock is publicly traded on the Tokyo Stock Exchange.

3. Plaintiff is a citizen of the state of Indiana.

4. The matter in controversy exceeds \$75,000.00, exclusive of interests and costs; this action does not arise under the Workmen's Compensation laws of any state; is not brought against a common carrier or its receivers or trustees; does not arise under 45 U.S.C. §§ 51-60; and, therefore, this cause is removable to this Court under 28 U.S.C. § 1441(b).

5. This Notice of Removal is being filed with this Court within 30 days after receipt of paper, specifically plaintiff's discovery responses, that this case is now applicable for removal to this Court under 28 U.S.C. § 1446(b)(3).

6. Copies of all process, pleadings, and orders served upon petitioner in the state court action are attached hereto. Promptly hereafter, written notice will be given to all adverse parties and to the Clerk of the Marion County Superior Court of Indiana, that this Petition for Removal is being filed with this Court.

WHEREFORE, defendant Speedway LLC prays that the entire state court action, under Cause No. 49D12-2203-CT-009127, now pending in the Marion County Superior Court of Indiana, be removed to this Court for all further proceedings.

FROST BROWN TODD LLC

By: /s/Thomas L. Davis

Thomas L. Davis, #4423-49
Attorneys for Defendant

CERTIFICATE OF SERVICE

Service of the foregoing was made electronically, this 20th day of June, 2022, upon the following:

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/s/Thomas L. Davis

Thomas L. Davis

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